

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEROME SEGAL, *et al.*,

*

Plaintiffs,

*

v.

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Civil Action No. 1:18-cv-02731-GJH

MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,

*

*

Defendants.

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DECLARATION OF NATASHA WALKER

I, Natasha Walker, am over the age of eighteen years of age, am competent to testify, have personal knowledge of the matters to which I testify below, and hereby declares as follows.

1. I have been employed by the Maryland State Board of Elections (the “State Board”) since 2003. I currently serve as Project Manager of Election Management Systems and have been performing the functions of that job since July, 2015. My work requires, among other things, coordinating the preparation of ballots in advance of the primary and general elections.

2. The deadline for a nominee to decline a nomination so that his or her name would not appear on the general election ballot is August 28, 2018.

3. The deadline for a party to fill a vacancy in nomination caused by a candidate’s declination of the nomination, death or disqualification, is September 7, 2018.

4. Pursuant to Md. Code Ann., Election Law § 9-207(a)(1), the certification of ballots must take place “at least 55 days before the election,” which, for the 2018 general election, imposes a deadline of September 12, 2018. However, because absentee ballots must be made available to military and overseas voters no later than 45 days before the election (this year, September 22, 2018) pursuant to 52 U.S.C. § 20302(a)(8), the State Board certified ballots as early as possible to allow for the completion of the several steps required to take place before the deadline for providing these ballots.

5. It was also important to certify ballots as early as possible due to the need to prepare “test decks” in order to run “logic and accuracy” (or “L&A”) testing on the vote tabulation machines before they are used during early voting and on election day. Test decks are sets of pre-filled ballots that are used to ensure that the tabulators are properly configured to count votes for every candidate in a given contest. It takes approximately two weeks to print the test decks used to test these machines. L&A testing can take as long as 3 weeks to complete for larger counties and testing must be complete for the general election by October 23, 2018. COMAR 33.10.02.14.A(2)(a).

6. For these reasons, the State Board certified the content and arrangement of the general election ballots on September 7, 2018, as soon as the last day for filling vacancies in nomination passed.

7. After it certified ballots on September 7, 2018, the State Board placed the ballots on public display for a period of two days as required by Election Law § 9-207. Also on September 7, the State Board imported ballot styles into its MDVOTERS database so that local election boards could proof ballot-style-to-precinct associations.

This step serves as a check to make sure voters in each precinct across the State receive the correct ballot. The State Board also provided preliminary ballot data to its web delivery system programmer for testing of web-delivered absentee ballots.

8. On September 10, 2018, after the required two days of public display, ballot PDFs were sent to the State Board's printing vendor for the printing of early voting and general election ballots. On September 11, 2018, test deck ballot PDFs were provided to the printer. It takes approximately two days to lay out the ballot styles and create the metal printing plates for each ballot style. When ballot styles change, new ballot-style PDFs must be sent to the printer, and the pre-print production process must be redone.

9. On September 11, 2018, the State Board send ballot PDFs to the absentee printer and mailhouse. On September 12, 2018, the State Board assigned ballot styles to the voters who (to date) have requested an absentee ballot for the current election and provided ballot PDFs and ballot data files to the web delivery system programmer. On September 13, 2018, the State Board sent absentee voter data to the absentee ballot printer and mailhouse. On September 13, 2018, the absentee ballot printer provided electronic proofs of the ballots to the State Board for review. The web delivery system programmer also began to test the delivery system for accuracy using the final ballot data. On September 17, 2018, the State Board completed its review of the electronic proofs from the absentee ballot printer.

10. Beginning on September 18, 2018, the absentee ballot printer will begin printing ballots and preparing the packets for mailing to overseas and military voters.

The first mail delivery will take place on September 21, 2018. The first web delivery will take place on September 20, 2018. The web delivery will be made on Thursday, September 20, to ensure that the next day is a business day, so that State Board staff is available to respond promptly to inquiries or problems regarding the web-delivered ballots.

11. On or around October 1, 2018, printed test decks and early voting/general election ballots will arrive at local boards of election. Local boards will begin L&A testing at that time, in order to complete L&A testing by the October 23, 2018 deadline.

12. This timetable allows ballots to be ready for delivery to military and overseas voters by Friday, September 21, 2018, in compliance with the September 22 federal deadline. It also allows for the required L&A testing to be complete by October 23, 2018, in accordance with the regulatory deadline.

13. In total, 368 different ballots will be in use across the State during the 2018 general election. We would need to revise all of these in order to add a state-wide candidate to the ballot if the Court were to order relief at this time.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 17, 2018

A handwritten signature in black ink, appearing to read 'Natasha Walker', is written over a horizontal line.

Natasha Walker